From: MCCLINCY Matt

To: Eric Blischke/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; Kristine Koch/R10/USEPA/US@EPA

Cc: ANDERSON Jim M
Subject: RPAC TZW

Date: 02/06/2008 02:02 PM

## Chip and Eric,

I left a voice mail message with Eric, but I though I would follow up with this e-mail.

The government team met with the LWG on June 27, 2007. At that meeting RPAC proposed to individually address data needs associated with their deep groundwater plume rather than have the LWG do this TZW-related work supporting the in-water RI. This appeared to be agreeable with everyone and is similar to what NWN and Gunderson did at their sites. However, it was not clear how EPA was going to manage RPAC doing this TZW work..

RPAC was to prepare an evaluation of in-water RI/FS data needs associated with the deep groundwater plume. Because of the potential for their groundwater to transport dioxin, RPAC also agreed to summarize the dioxin issues as part of the deep groundwater plume data gaps evaluation. At the conclusion of the 6/27 meeting it was expected that RPAC would provide the data gaps evaluation ASAP (e.g., within the next two weeks), and EPA would caucus and identify RPAC TZW RI data needs if any.

On October 1, 2007 RPAC provided DEQ the document *Evaluation of Groundwater Discharge to the Willamette River*. This document was not copied to the LWG or EPA. DEQ forwarded it to both. On October 2, 2007 DEQ sent and e-mail to the TCT notifying everyone that the document had been received and that DEQ considered it to be primarily a document related to the in-water RI. The e-mail requested that EPA identify a review schedule for the document.

On November 7, 2007 RPAC submitted a document titled *Evaluation of the Usability of Groundwater Dioxin Data Below the EPA Method 1613B Minimum Level.* Besides being the companion document related to in-water data gaps the document has clear implications for upland source control. The document cites a number of EPA sources in drawing its conclusions. Given this, DEQ requested that EPA provide the initial review of the document. Kristine agreed to coordinate this. On November 20, 2007, EPA requested that RPAC respond to a number of initial questions to help EPA complete their review. DEQ forwarded these to AMEC. DEQ has not received a response from AMEC, but we have been told that there has been some communication between AMEC and EPA regarding EPA's questions.

Recently, RPAC noted that DEQ review of these two documents is outstanding. I wanted to coordinate a response to RPAC on the review status of these documents. DEQ's preference is for EPA to send a letter clarifying the status of the LWG handoff of this data gap to RPAC, what the EPA review schedule is and the implications for this potential data gap given the timing of the RPAC submittals and current project schedule.

Matt McClincy
Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Ave., Suite 400
Portland, Oregon 97201-4987
Phone 503-229-5538
Fax 503-229-6945